

# **Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

PFLAG, INC., et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, et al.,

*Defendants.*

Civil Action No. 8:25-cv-00337-BAH

**DECLARATION OF OMAR GONZALEZ-PAGAN IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO STAY  
PRELIMINARY INJUNCTION PENDING APPEAL**

I, Omar Gonzalez-Pagan, hereby declare and state:

1. I am over 18 years of age, of sound mind, and fully capable of making this declaration. I have personal knowledge of the facts set forth in this declaration, they are true and correct, and I would be able to testify about these facts if I were called as a witness at a hearing or trial.

2. I am a licensed attorney in the Commonwealth of Massachusetts and the State of New York. I am Senior Counsel and Health Care Strategist at Lambda Legal, and counsel for Plaintiffs in this action.

3. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Stay the Preliminary Injunction Pending Appeal.

4. On March 28, 2025, Vinita Andrapalliyal, Senior Counsel at the U.S. Department of Justice and former counsel for the government in the instant case, represented via email that the government was not planning to seek a stay of the preliminary injunction in this matter, writing

“DOJ is not planning to seek a stay of the PI as things currently stand, but we’d reserve the right to seek a stay depending on any subsequent orders.” **Exhibit A-1** is a true and correct copy of that email correspondence.

5. On June 20, 2025, Jacob Christensen, an attorney at the U.S. Department of Justice Civil Division, Appellate Staff, wrote to counsel for Plaintiffs proposing a lengthy briefing schedule for the government’s appeal to the Court of Appeals for the Fourth Circuit. The parties subsequently negotiated a schedule that is currently in place. **Exhibit A-2** is a true and accurate copy of the email correspondence.

6. On August 12, 2025, the District Court for the Western District of Washington filed an order in *L.B. v. Premera*, No. 2:23-cv-00953-TSZ, concluding that “nothing in *Skrmetti* undermines the validity of *Bostock* or the extension of *Bostock* from Title VII to Title IX and/or ACA § 1557.” **Exhibit A-3** is a true and correct copy of that order.

7. On August 14, 2025, the District Court for the District of Maryland filed a memorandum opinion in *Am. Ass’n of Physicians for Human Rts., Inc. v. Nat’l Inst. of Health*, No. 8:25-cv-01620-LKG, holding that certain directives and actions by the National Institutes of Health and the U.S. Department of Health and Human Services prohibiting funding for research related to gender identity or LGBTQI+ health violate Section 1557 of the Affordable Care Act. **Exhibit A-4** is a true and correct copy of that memorandum opinion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 15th day of August, 2025.

/s/ Omar Gonzalez-Pagan  
Omar Gonzalez-Pagan